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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

AFFIDAVIT IN SUPPORT OF
REMOVAL TO THE JUDICIAL
DISTRICT OF PUERTO RICO

- against -

VICTOR F. ROSARIO O'NEILL,
also known as
"Watusi" and
"Flaco"

(Fed. R. Crim. P. 5(c))

Defendant.

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

ANGEL MERCADO, being duly sworn, deposes and says that he is a Deputy United States Marshal with the United States Marshals Service ("USMS"), duly appointed according to law and acting as such.

Upon information and belief, on October 6, 2011, an arrest warrant was issued by the United States District Court for the Judicial District of Puerto Rico, commanding the arrest of the defendant VICTOR F. ROSARIO O'NEILL, also known as "Watusi" and "Flaco" for Conspiracy to Distribute and Possess With Intent to Distribute Narcotic Controlled Substances namely: five kilograms or more of a mixture or substance containing a detectable amount of cocaine, two hundred eighty (280) grams or more of a mixture or substance containing a detectable amount of cocaine base ("crack"), a mixture or substance containing a detectable amount of heroin, a mixture or substance containing a detectable amount of marijuana and "oxycodone," in violation of

21 U.S.C. Sections 841(a)(1), 841(b)(1)(A), 841(b)(1)(C), 841(b)(1)(D), 846 and 860.

The source of your deponent's information and the grounds for his belief are as follows:

1. On October 6, 2011, an arrest warrant was issued by the United States District Court for the Judicial District of Puerto Rico, commanding the arrest of the defendant VICTOR F. ROSARIO O'NEILL, also known as "Watusi" and "Flaco," for Conspiracy to Distribute and Possess With Intent to Distribute Narcotic Controlled Substances namely: five kilograms or more of a mixture or substance containing a detectable amount of cocaine, two hundred eighty (280) grams or more of a mixture or substance containing a detectable amount of cocaine base ("crack"), a mixture or substance containing a detectable amount of heroin, a mixture or substance containing a detectable amount of marijuana and "oxycodone," in violation of 21 U.S.C. Sections 841(a)(1), 841(b)(1)(A), 841(b)(1)(C), 841(b)(1)(D), 846 and 860. A copy of the arrest warrant and complaint are attached hereto.

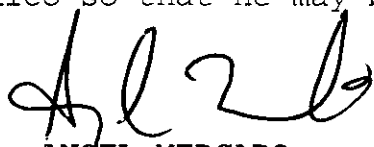
2. On or about August 03, 2012, the USMS Regional Fugitive Task Force received information that the defendant VICTOR F. ROSARIO O'NEILL, also known as "Watusi" and "Flaco" was incarcerated on unrelated charges at the Rikers Island Correctional Facility in Queens, New York ("Rikers Island"). New York State arrest photographs, pedigree information and fingerprints of the defendant obtained by USMS further confirmed that the individual incarcerated at Rikers Island was the

individual named in the arrest warrant referenced in paragraph 1.

3. On August 14, 2012, the defendant was released from Rikers Island and transported by USMS Deputies to the Federal Courthouse in the Eastern District of New York.

4. It is the desire of the United States Attorney for the Judicial District of Puerto Rico that the defendant VICTOR F. ROSARIO O'NEILL, also known as "Watusi" and "Flaco" be removed to that district for prosecution.

WHEREFORE, it is requested that the defendant VICTOR F. ROSARIO O'NEILL, also known as "Watusi" and "Flaco" be removed to the Judicial District of Puerto Rico so that he may be dealt with according to law.


ANGEL MERCADO
Deputy U.S. Marshal

Swor
14th

THE GOLD
UNIT : JUDGE
EASTERN DISTRICT OF NEW YORK

UNITED STATES DISTRICT COURT

for the

Judicial District of Puerto Rico

United States of America

v.

[53] Victor F. Rosario-O'Neill, aka Watusi and Flaco

Defendant

Case No. 11-388 (ADC)

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay
(name of person to be arrested) Victor F. Rosario-O'Neill, aka Watusi and Flaco

who is accused of an offense or violation based on the following document filed with the court:

☒ Indictment
 ☐ Superseding Indictment
 ☐ Information
 ☐ Superseding Information
 ☐ Complaint
☐ Probation Violation Petition
☐ Supervised Release Violation Petition
☐ Violation Notice
☐ Order of the Court

This offense is briefly described as follows:

the defendant herein, along with other unindicted co-conspirators to the Grand Jury known and unknown, did knowingly and intentionally combine, conspire, confederate, and agree with others, to commit an offense against the United States, that is, to possess with intent to distribute, and distribute narcotic controlled substances, to wit: five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine, two hundred and eighty (280) grams or more of a mixture or substance containing a detectable amount of cocaine base ("crack"), a detectable amount of heroin, and a mixture or substance containing a detectable amount of marijuana at the Luis Lloréns Torres Public Housing Project, and within one thousand (1,000) feet of the real property comprising two (2) elementary public schools, that is the Luis Lloréns Torres Elementary Public School and the María Martínez De Pérez Almiroti Elementary Public School. All in violation of T. 21 USC §§ 841(a)(1), 841(b)(1)(A), 841(b)(1)(C), 841(b)(1)(D), 846, and 860.

Date: OCT - 6 2011

[Signature]
Issuing officer's signature

City and state: SAN JUAN, PUERTO RICO

MARCOS E. LÓPEZ U.S. MAGISTRATE JUDGE
Printed name and title

Return

This warrant was received on (date) _____, and the person was arrested on _____
at (city and state) _____

Date: _____

Arresting officer's signature

Printed name and title

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO



UNITED STATES OF AMERICA,

Plaintiff,

v.

[1] MALVIN NATER AYALA, aka "Malvin"
[Counts ONE and TWO]

[2] EMANUEL RODRIGUEZ ISAAC,
aka "Manuelito",
[Counts ONE and TWO]

[3] CHRISTIAN ROSARIO BONILLA,
aka "Christian Nora" and "Mellao",
[Counts ONE and TWO]

[4] MELVIN BENITEZ AYALA, aka "Wichi"
[Counts ONE and TWO]

[5] JONATHAN MORALES-AYALA,
Aka "Yani Bembul",
[Counts ONE and TWO]

[6] CARLOS MORALES AYALA,
aka "Charlie"
[Counts ONE and TWO]

[7] LUIS ORTIZ GONZALEZ,
aka "Luis Ortiz",
[Counts ONE and TWO]

[8] JESUS MALDONADO CALDERON,
aka "Jesus Lata"
[Counts ONE and TWO]

[9] HECTOR MARQUEZ VELAZQUEZ,
aka "Luis Peluca"
[Counts ONE and TWO]

INDICTMENT

CRIMINAL NO. 11-388 (ADC)

FILED UNDER SEAL

Violations:

COUNT ONE:

Title 21, U.S.C., § 846
Title 21, U.S.C., § 841(a)(1)
Title 21, U.S.C., § 841(b)(1)(A)
Title 21, U.S.C., § 841(b)(1)(C)
Title 21, U.S.C., § 860

COUNT TWO:

Title 18, U.S.C., § 924(o)
Title 18, U.S.C., § 924(c)(1)(A)(i)
Title 18, U.S.C., § 924(c)(1)(A)(ii)
Title 18, U.S.C., § 924(c)(1)(A)(iii)

(TWO COUNTS)

[10] JORGE B. ANDRADES-CARABALLO,
aka "Benny Chichi",
[Counts ONE and TWO]

[11] CARLOS E. VAZQUEZ MARTINEZ,
aka "Carlote",
[Counts ONE and TWO]

[12] WILMER NIEVES CORREA,
aka "Pichi",
[Counts ONE and TWO]

[13] EDGARDO J. GARCIA ORTIZ,
aka "Gordo Sire" and "Edgardo",
[Counts ONE and TWO]

[14] ANGEL D. SANTIAGO RODRIGUEZ
aka "Gidel",
[Counts ONE and TWO]

[15] FNU LNU, aka "Chino 25", aka "Chino
Valencia"
[Counts ONE and TWO]

[16] HOMMY LOPEZ ESPIER, aka "Hommy",
[Counts ONE and TWO]

[17] JAVIER LNU aka "Gato",
[Counts ONE and TWO]

[18] JOSE A. ORTIZ ACOSTA
aka "Anthony Clemente",
[Counts ONE and TWO]

[19] FNU LNU, aka "Luigi de Piñones",
[Counts ONE and TWO]

[20] ISMAEL CRUZ-RAMOS, aka "Chapu",
[Counts ONE and TWO]

[21] RAFAEL CLAUDIO ZAYAS,
aka "Claudio",
[Counts ONE and TWO]

[22] EDWIN DELGADO CABRERA, aka
"Edwin",
[Counts One and TWO]

[23] ALEXANDER NATER AYALA,
aka "Alex Nater",
[Count ONE]

[24] ROBERTO LOPEZ OCASIO,
aka "Titoi",
[Counts ONE and TWO]

[25] CHRISTOPHER CRUZ MORALES,
aka "Tuti",
[Counts ONE and TWO]

[26] RAMON A. ROSA HANCE,
aka "Neon" and "Neo",
[Counts ONE and TWO]

[27] JONATHAN CARMONA ROSARIO,
aka "Jonathan",
[Counts ONE and TWO]

[28] NESTOR ALOMAR REYES, aka Anibal
[Counts ONE and TWO]

[29] JAVIER LOZADA AYUSO,
aka "Parcha",
[Count ONE]

[30] RAFAEL CRUZ MONTALVO, aka
"Rapper",
[Count ONE]

[31] JAVIER LLANOS MARQUEZ, aka
"Peppere",
[Count ONE]

[32] ANGELO ALICEA FIGUEROA,
aka "Maran",
[Count ONE]

[33] VICTOR AYALA PRIETO,
aka "Vitito",

[Counts ONE and TWO]

[34] CARLOS A. TORRES CARMONA,
aka "Chocho",

[Counts ONE and TWO]

[35] CARLOS CARMONA AYUSO,
aka "Whirlpool",

[Counts ONE and TWO]

[36] SHALIM SERRANO MENDEZ,
aka "Shalim",

[Count ONE]

[37] EDUARDO REYES NUÑEZ,
aka "Aja",

[Counts ONE and TWO]

[38] CARLOS MORALES ARROYO,
aka "Cachuflo",

[Count ONE]

[39] FNU LNU, aka "Jorge"

[Counts ONE and TWO]

[40] LUIS FIGUEROA DELGADO,
aka "Buho",

[Counts ONE and TWO]

[41] JENSEN GONZALEZ VILLARAN,
aka "El Gordo Jensen",

[Count ONE]

[42] JAYCBALL MONTALVO ROSA,
aka "Jaycball",

[Counts ONE and TWO]

[43] LUIS PAGAN CANDELARIA,
aka "Oso",

[Counts ONE and TWO]

[44] ALFREDO NOBLE MEDINA,
aka "Speedy"
[Counts ONE and TWO]

[45] ANGEL OSORIO PAGAN,
aka "Angel Belen",
[Counts ONE and TWO]

[46] EDDIE OSORIO PAGAN,
aka "Gordo Belen"
[Count ONE]

[47] LUIS FRIAS DANZOT,
aka "Pinguí",
[Counts ONE and TWO]

[48] ANGEL L. NOBLE MEDINA,
aka "Pinto"
[Count ONE]

[49] CARMELO VAZQUEZ MARTINEZ,
aka "Lito"
[Counts ONE and TWO]

[50] JOSE MARTINEZ ROBLES,
aka "Bimbo"
[Counts ONE and TWO]

[51] FNU LNU, aka "Neñe"
[Counts ONE and TWO]

[52] FABIAN REYES ROCHE,
aka "Fabian",
[Counts ONE and TWO]

[53] VICTOR F. ROSARIO O'NEILL,
aka "Watusi" and "Flaco",
[Count ONE]

[54] DANIEL ALEXANDER SOTO,
aka "Danny",
[Count ONE]

[55] FELIX ESPERANZA HERRERA,
aka "Bayamon",
[Count ONE]

[56] GADIEL ESCALERA ROMERO,
aka "Gadiel",
[Counts ONE and TWO]

[57] JOEL GUZMAN RODRIGUEZ,
aka "Joito" and "Joe",
[Count ONE]

[58] ANNETTE LUZ RAMOS RIVERA,
aka "Chimi",
[Count ONE]

[59] MELVIN COLON CALDERON,
aka "El Jorobado",
[Count ONE]

[60] ROLANDO LOPEZ ORTIZ,
aka "Rolo",
[Count ONE]

[61] JOSUE LNU, aka "Gallo", "Vikingo",
[Count ONE]

[62] MAYLENI CHAVEZ, aka "Maileni",
[Count ONE]

[63] JOSUE C. ANDINO FLORES,
aka "Marito", aka "Milety",
[Counts ONE and TWO]

[64] FNU LNU, aka "Tio de Gidel",
[Count ONE]

[65] STEPHANY QUIÑONES SAYAS,
aka "Fanny",
[Count ONE]

[66] PEDRO MARTINEZ ALVAREZ
aka "Pedro Bemba",
[Counts ONE and TWO]

[67] VICTOR A. RIVERA ORTIZ,
aka "Papito Bocón" and "Papito China",
[Counts ONE and TWO]

[68] ALEJANDRO J. GUEDE PORTILLA,
aka "Cuba" and "Alex",
[Counts ONE and TWO]

[69] VICTOR ISAAC DEL VALLE, aka "Isaac"
[Count ONE]

[70] ERIC J. GONZALES ALVAREZ,
aka "Arroz"
[Counts ONE and TWO]

[71] MIGUEL FRIAS DANZOT, aka "Macho"
[Counts ONE and TWO]

[72] JUAN SANCHEZ ARAOBA , aka "Cano de
Guaynabo"
[Counts ONE and TWO]

[73] FNU LNU, aka "Pito"
[Counts ONE and TWO]

[74] STEPHANIE VENTURA VELAZQUEZ,
aka "Stephanie",
[Count One]

[75] MYRNA LUZ DURAN, aka "Nana"
[Count ONE]

[76] HECTOR RODRIGUEZ MORALES,
aka "Cano",
[Count ONE]

[77] FNU LNU, aka Chiringa
[Count ONE]

[78] YIRAICA TORRES ROMERO,
aka "Nana La Negra",
[Count ONE]

[79] JUAN MORALES ENCARNACION,
aka "Juango",
[Counts ONE and TWO]

[80] GEORGE W. RIVERA RIVERA,
aka "Wesley",
[Counts ONE]

[81] VICTOR FLORES MACHICOTE,
aka "Vitilo",
[Count ONE]

[82] BARBARA MARTINEZ AYUSO,
aka "Barbie",
[Count ONE]

Defendants,

THE GRAND JURY CHARGES:

COUNT ONE

(Conspiracy to Possess with Intent to Distribute and Distribution)

From in or about March 2007, and continuing up to the date of the return of this Indictment, in the District of Puerto Rico, elsewhere, and within the jurisdiction of this Court,

[1] MALVIN NATER AYALA, aka "Malvin"

[2] EMANUEL RODRIGUEZ ISAAC, aka "Manuelito",

[3] CHRISTIAN ROSARIO BONILLA,
aka "Christian Nora" and "Mellao",

[4] MELVIN BENITEZ AYALA, aka "Wichi"

[5] JONATHAN MORALES-AYALA, aka "Yani Bembul",

[6] CARLOS MORALES AYALA, aka "Charlie"

[7] LUIS ORTIZ GONZALEZ, aka "Luis Ortiz",

[8] JESUS MALDONADO CALDERON, aka "Jesus Lata"

[9] HECTOR MARQUEZ VELAZQUEZ, aka "Luis Peluca"

[10] JORGE B. ANDRADES-CARABALLO, aka "Benny Chichi",

[11] CARLOS E. VAZQUEZ MARTINEZ, aka "Carlote",

[12] WILMER NIEVES CORREA, aka "Pichi",

[13] EDGARDO J. GARCIA ORTIZ,
aka "Gordo Sire" and "Edgardo",

[14] ANGEL D. SANTIAGO RODRIGUEZ, aka "Gidel",

[15] FNU LNU, aka "Chino 25", aka "Chino Valencia"

[16] HOMMY LOPEZ ESPIER, aka "Hommy",

[17] JAVIER LNU aka "Gato",

[18] JOSE A. ORTIZ ACOSTA aka "Anthony Clemente",

[19] FNU LNU, aka "Luigi de Piñones",

[20] ISMAEL CRUZ-RAMOS, aka "Chapu",

[21] RAFAEL CLAUDIO ZAYAS, aka "Claudio",

[22] EDWIN DELGADO CABRERA, aka "Edwin",

[23] ALEXANDER NATER AYALA, aka "Alex Nater",

[24] ROBERTO LOPEZ OCASIO, aka "Titoi",

[25] CHRISTOPHER CRUZ MORALES, aka "Tuti",

[26] RAMON A. ROSA HANCE, aka "Neon", aka "Neo",

[27] JONATHAN CARMONA ROSARIO, aka "Jonathan",

[28] NESTOR ALOMAR REYES, aka Anibal

[29] JAVIER LOZADA AYUSO, aka "Parcha",

- [30] RAFAEL CRUZ MONTALVO aka "Rapper",
- [31] JAVIER LLANOS MARQUEZ, aka "Peppere"
- [32] ANGELO ALICEA FIGUEROA, aka "Maran",
- [33] VICTOR AYALA PRIETO, aka "Vitito",
- [34] CARLOS A. TORRES CARMONA, aka "Chocho",
- [35] CARLOS CARMONA AYUSO, aka "Whirlpool",
- [36] SHALIM SERRANO MENDEZ, aka "Shalim",
- [37] EDUARDO REYES NUÑEZ, aka "Aja",
- [38] CARLOS MORALES ARROYO, aka "Cachuflo",
- [39] FNU LNU, aka "Jorge"
- [40] LUIS FIGUEROA DELGADO, aka "Buho",
- [41] JENSEN GONZALEZ VILLARAN, aka "El Gordo Jensen",
- [42] JAYCBALL MONTALVO ROSA, aka "Jaycball",
- [43] LUIS PAGAN CANDELARIA, aka "Oso",
- [44] ALFREDO NOBLE MEDINA, aka "Speedy"
- [45] ANGEL OSORIO PAGAN, aka "Angel Belen",
- [46] EDDIE OSORIO PAGAN, aka "Gordo Belen"
- [47] LUIS FRIAS DANZOT, aka "Pinguí",
- [48] ANGEL L. NOBLE MEDINA, aka "Pinto"
- [49] CARMELO VAZQUEZ MARTINEZ, aka "Lito"
- [50] JOSE MARTINEZ ROBLES, aka "Bimbo"
- [51] FNU LNU, aka "Ñeñe"

- [52] FABIAN REYES ROCHE, aka "Fabian",
- [53] VICTOR F. ROSARIO O'NEILL, aka "Watusi" and "Flaco",
- [54] DANIEL ALEXANDER SOTO, aka "Danny",
- [55] FELIX ESPERANZA HERRERA, aka "Bayamon",
- [56] GADIEL ESCALERA ROMERO, aka "Gadiel",
- [57] JOEL GUZMAN RODRIGUEZ, aka "Joito" and "Joe",
- [58] ANNETTE LUZ RAMOS RIVERA, aka "Chimi",
- [59] MELVIN COLON CALDERON, aka "El Jorobado",
- [60] ROLANDO LOPEZ ORTIZ, aka "Rolo",
- [61] JOSUE LNU, aka "Gallo", "Vikingo",
- [62] MAYLENI CHAVEZ, aka "Maileni",
- [63] JOSUE C. ANDINO FLORES, aka "Marito", aka "Milety"
- [64] FNU LNU, aka "Tio de Gidel",
- [65] STEPHANY QUIÑONES SAYAS, aka "Fanny",
- [66] PEDRO MARTINEZ ALVAREZ, aka "Pedro Bemba",
- [67] VICTOR A. RIVERA ORTIZ,
aka "Papito Bocón" and "Papito China",
- [68] ALEJANDRO J. GUEDE PORTILLA, aka "Cuba" and "Alex",
- [69] VICTOR ISAAC DEL VALLE, aka "Isaac"
- [70] ERIC J. GONZALES ALVAREZ, aka "Arroz"
- [71] MIGUEL FRIAS DANZOT, aka "Macho"
- [72] JUAN SANCHEZ ARAOBA, aka "Cano de Guaynabo"

[73] FNU LNU, aka "Pito"

[74] STEPHANIE VENTURA VELAZQUEZ, aka "Stephanie",

[75] MYRNA LUZ DURAN, aka "Nana"

[76] HECTOR RODRIGUEZ MORALES, aka "Cano",

[77] FNU LNU, aka Chiringa

[78] YIRAICA TORRES ROMERO, aka "Nana La Negra",

[79] JUAN MORALES ENCARNACION, aka "Juango",

[80] GEORGE W. RIVERA RIVERA, aka "Wesley",

[81] VICTOR FLORES MACHICOTE, aka "Vitulo",

[82] BARBARA MARTINEZ AYUSO, aka "Barbie",

the defendants herein, along with other unindicted co-conspirators to the Grand Jury known and unknown, did knowingly and intentionally combine, conspire, confederate and agree together and with each other, and with diverse other persons, to commit an offense against the United States, that is, to possess with intent to distribute, and distribute narcotic controlled substances, namely: five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II Narcotic Drug Controlled Substance, two hundred eighty (280) grams or more of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II Controlled Substance a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance, a mixture or substance containing a detectable amount of marijuana, a Schedule I Controlled Substance, and a detectable amount of "Oxycodone" a Schedule II Controlled Substance at the Luis Llorens Torres Public Housing Project, and within one thousand (1,000) feet of the real property comprising two (2) elementary public schools, that is, the Luis Llorens Torres Elementary Public School, and the Maria

Martinez De Perez Almiroti Elementary Public School, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), 841(b)(1)(C), 841(b)(1)(D), 846 and 860.

OBJECT OF THE CONSPIRACY

The object of the conspiracy was to possess with the intent to distribute and to distribute cocaine, cocaine base ("crack"), heroin, and marijuana, at a drug distribution point ("drug point") located at the sector known as "Calle 4" within the Luis Llorens Torres Public Housing Project, Puerto Rico, for significant financial gain and profit.

MANNERS AND MEANS OF THE CONSPIRACY

The following were among the manners and means used by the defendants and the co-conspirators to carry out the objects of the conspiracy and to ensure the success of their criminal enterprise:

1. It was part of the conspiracy that co-conspirators would plan and arrange for the purchase of wholesale quantities of cocaine, cocaine base ("crack"), heroin, and marijuana, from different locations for subsequent distribution.
2. It was part of the conspiracy that co-conspirators would plan and arrange for the distribution and sale of cocaine, cocaine base ("crack"), heroin, marijuana, and Oxycodone (commonly known as Percocet) in various locations within the "Calle 4" area in the Luis Llorens Torres Public Housing Project.
3. It was further part of the conspiracy that co-conspirators would use apartments and other locations to cook cocaine base (crack), store, process, package and sell the drugs, and to conceal drugs, drug paraphernalia, drug ledgers, drug proceeds, scanners, firearms and ammunition.

4. It was further part of the conspiracy that co-conspirators would use veiled or coded references in conversations to make covert references to drugs, firearms and violent crimes.

5. It was further part of the conspiracy that co-conspirators would keep each other informed of their activities, plan future transactions, and share information about drug trafficking activities for the purpose of avoiding detection and ensuring the success of their criminal enterprise.

6. It was further part of the conspiracy that co-conspirators would use aliases and other means to avoid detection by law enforcement authorities.

7. It was further part of the conspiracy that co-conspirators would, at various times during the conspiracy, perform different roles and functions in furtherance of the organization's drug trafficking activities.

8. It was further part of the conspiracy that co-conspirators would arrange for and coordinate the pick-up of United States currency from the illegal sale of narcotics ("drug proceeds").

9. It was further part of the conspiracy that co-conspirators would purchase, possess, carry, use, brandish and discharge firearms in order to maintain control over the drug point and to protect themselves, their drugs, and their drug proceeds from rival individuals and organizations, and to expand their drug trafficking business to other areas within the Luis Llorens Torres Public Housing Project and to areas outside of the Luis Llorens Torres Public Housing Project.

10. It was further part of the conspiracy that co-conspirators would distribute

narcotics and controlled substances within a distance of one thousand (1,000) feet from the grounds of the elementary public schools and the Head Start center at the Luis Llorens Public Housing Project.

ROLES OF THE MEMBERS OF THE CONSPIRACY

A. Leaders

Co-conspirators [1] MALVIN NATER AYALA, aka "Malvin", [2] EMANUEL RODRIGUEZ ISAAC, aka "Manuelito", and [3] CHRISTIAN ROSARIO BONILLA, aka "Christian Nora" and "Mellao", were the leaders, and organizers of the drug trafficking organization. They would lead, organize, control, manage, and supervise the purchase of wholesale quantities of narcotics and the sale of narcotics and controlled substances at the drug point located in the "Calle 4" area at the Luis Llorens Public Housing Project, Puerto Rico, and other areas. They would direct and supervise subordinates including the enforcers, drug point owners, runners, sellers, and facilitators. They would possess, carry, use, brandish and discharge firearms to enforce their directives and to maintain their control over the drug trafficking organization.

B. Enforcers

Co-conspirators [4] MELVIN BENITEZ AYALA, aka "Wichi", [5] JONATHAN MORALES-AYALA, aka "Yani Bembul", [6] CARLOS MORALES AYALA, aka "Charlie", [7] LUIS ORTIZ GONZALEZ, aka "Luis Ortiz", [8] JESUS MALDONADO CALDERON, aka "Jesus Lata", [9] HECTOR MARQUEZ VELAZQUEZ, aka "Luis Peluca", [10] FNU LNU, aka "Benny Chichi", [11] CARLOS E. VAZQUEZ MARTINEZ, aka "Carlote", [12] WILMER NIEVES CORREA, aka "Pichi", [13] EDGARDO J.

GARCIA ORTIZ, aka "Gordo Sire" aka "Edgardo", [14] ANGEL D. SANTIAGO RODRIGUEZ, aka "Gidel", [15] FNU LNU, aka "Chino 25", aka "Chino Valencia", [16] HOMMY LOPEZ ESPIER, aka "Hommy", [17] JAVIER LNU aka "Gato", served as enforcers in this conspiracy. As enforcers, they would possess, carry, use, brandish and discharge firearms, in order to maintain control over the drug points and provide protection to the day-to-day drug distribution operations, themselves, and against rival individuals and organizations.

C. Suppliers

Co-conspirators [3] **CHRISTIAN ROSARIO BONILLA, aka "Christian Nora" and "Mellao", [18] JOSE A. ORTIZ ACOSTA, aka "Anthony Clemente", and [19] FNU LNU, aka "Luigi de Piñones", [20] ISMAEL CRUZ RAMOS, aka "Chapu", [21] RAFAEL CLAUDIO ZAYAS, aka "Claudio" [22] EDWIN DELGADO CABRERA, aka "Edwin",** served as suppliers of Cocaine Base (Crack), Cocaine, Heroin, and Marijuana for the drug trafficking organization. They would also supply firearms to the members of the organization in furtherance of the drug trafficking business at diverse times during the conspiracy.

D. Owners

Co-conspirators [1] **MALVIN NATER AYALA, aka "Malvin", [2] EMANUEL RODRIGUEZ ISAAC, aka "Manuelito", [3] CHRISTIAN ROSARIO BONILLA, aka "Christian Nora" and "Mellao" [4] MELVIN BENITEZ AYALA, aka "Wichi", [8] JESUS MALDONADO CALDERON, aka "Jesus Lata", [9] HECTOR MARQUEZ VELAZQUEZ, aka "Luis Peluca", [10] FNU LNU, aka "Benny Chichi", [12] WILMER NIEVES CORREA, aka "Pichi", [13] EDGARDO J. GARCIA ORTIZ, aka "Gordo Sire"**

aka "Edgardo", [15] FNU LNU, aka "Chino 25", aka "Chino Valencia", [23] ALEXANDER NATER AYALA, aka "Alex Nater", [24] ROBERTO LOPEZ OCASIO, aka "Titoi", [25] CHRISTOPHER CRUZ MORALES, aka "Tuti", [26] RAMON A. ROSA HANCE, aka "Neon" and "Neo", [27] JONATHAN CARMONA ROSARIO, aka "Jonathan", [28] NESTOR ALOMAR REYES, aka "Anibal", [29] JAVIER LOZADA AYUSO, aka "Parcha", [30] RAFAEL CRUZ MONTALVO aka "Rapper", [31] JAVIER LLANOS MARQUEZ, aka "Peppere", [32] ANGELO ALICEA FIGUEROA, aka "Maran", [42] JAYCBALL MONTALVO ROSA, aka "Jaycball" were the owners of the drugs distributed in Calle 4 and other areas. They would supervised runners and sellers, whose principal tasks were: (a) to cook, prepare and package the drugs for subsequent sale at the drug points; (b) to supply sellers with the drugs to be sold; (c) to distribute the controlled substances and to collect the proceeds derived from their sale; (d) to provide protection for the controlled substances, the proceeds, the sellers, and to the day to day activities at the drug point. They organized, managed and directed others in charge of the distribution of their respective controlled substances.

E. Runners

Co-conspirators [9] HECTOR MARQUEZ VELAZQUEZ, aka "Luis Peluca", [14] ANGEL D. SANTIAGO RODRIGUEZ aka "Gidel", [33] VICTOR AYALA PRIETO, aka "Vitito", [34] CARLOS A. TORRES CARMONA, aka "Chocho", [35] CARLOS CARMONA AYUSO, aka "Whirlpool", [36] SHALIM SERRANO MENDEZ, aka "Shalim", [37] EDUARDO REYES NUÑEZ, aka "Aja", [38] CARLOS MORALES ARROYO, aka "Cachuflo", [39] FNU LNU, aka "Jorge", [40] LUIS FIGUEROA

DELGADO, aka “Buho”, [41] JENSEN GONZALEZ VILLARAN, aka “El Gordo Jensen”, [52] FABIAN REYES ROCHE, aka “Fabian”, served as runners for the drug trafficking organization. As runners they would receive, prepare and supply packaged narcotics to the sellers for distribution at the drug point. They would keep drug ledgers, collect the drug proceeds and deliver the proceeds to the owners. The runners would organize, manage and supervise the drug sellers and facilitators. When needed some of them would possess, carry and use firearms to protect the drug trafficking business.

F. Sellers

Co-conspirators [7] **LUIS ORTIZ GONZALEZ, aka “Luis Ortiz”, [8] JESUS MALDONADO CALDERON, aka “Jesus Lata”, [9] HECTOR MARQUEZ VELAZQUEZ, aka “Luis Peluca”, [10] JORGE B. ANDRADES-CARABALLO, aka “Benny Chichi”, [11] CARLOS E. VAZQUEZ MARTINEZ, aka “Carlote”, [12] WILMER NIEVES CORREA, aka “Pichi”, [13] EDGARDO J. GARCIA ORTIZ, aka “Gordo Sire” and “Edgardo”, [14] ANGEL D. SANTIAGO RODRIGUEZ, aka “Gidel”, [16] HOMMY LOPEZ ESPIER, aka “Hommy”, [25] CHRISTOPHER CRUZ MORALES, aka “Tuti”, [27] JONATHAN CARMONA ROSARIO, aka “Jonathan”, [33] VICTOR AYALA PRIETO, aka “Vitito”, [34] CARLOS A. TORRES CARMONA, aka “Chocho”, [35] CARLOS CARMONA AYUSO, aka “Whirlpool”, [38] CARLOS MORALES ARROYO, aka “Cachuflo”, [40] LUIS FIGUEROA DELGADO, aka “Buho”, [42] JAYCBALL MONTALVO ROSA, aka “Jaycball”, [43] LUIS PAGAN CANDELARIA, aka “Oso”, [44] ALFREDO NOBLE MEDINA, aka “Speedy”, [45] ANGEL OSORIO PAGAN, aka “Angel Belen”, [46] EDDIE OSORIO PAGAN, aka**

“Gordo Belen”, [47] LUIS FRIAS DANZOT, aka “Pinguí”, [48] ANGEL L. NOBLE MEDINA, aka “Pinto”, [49] CARMELO VAZQUEZ MARTINEZ, aka “Lito”, [50] JOSE MARTINEZ ROBLES, aka “Bimbo”, [51] FNU LNU, aka “Neñe”, [52] FABIAN REYES ROCHE, aka “Fabian”, [53] FRANCISCO V. ROSARIO O’NEILL, aka “Watusi” and “Flaco”, [54] DANIEL ALEXANDER SOTO, aka “Danny”, [55] FELIX ESPERANZA HERRERA, aka “Bayamon”, [56] GADIEL ESCALERA ROMERO, aka “Gadiel”, [57] JOEL GUZMAN RODRIGUEZ, aka “Joito” and “Joe”, [58] LUZ ANNETTE RAMOS RIVERA, aka “Chimi”, [59] MELVIN COLON CALDERON, aka “El Jorobado”, [60] ROLANDO LOPEZ ORTIZ, aka “Rolo”, [61] JOSUE LNU, aka “Gallo”, aka “Vikingo”, [62] MAILENI CHAVEZ, aka “Maileni”, [63] JOSUE C. ANDINO FLORES, aka “Marito”, aka “Milety”, [64] FNU LNU, aka “Tio de Gidel”, [65] STEPHANY QUIÑONES SAYAS, aka “Fanny”, [66] PEDRO MARTINEZ ALVAREZ aka “Pedro Bemba”, [67] VICTOR A. RIVERA ORTIZ, aka “Papito Bocón”, aka “Papito China”, [68] ALEJANDRO J. GUEDE PORTILLA, aka “Cuba” and “Alex”, [69] VICTOR ISAAC DEL VALLE, aka “Isaac”, [70] ERIC J. GONZALES ALVAREZ, aka “Arroz”, [71] MIGUEL FRIAS DANZOT, aka “Macho”, [72] JUAN SANCHEZ ARAOBA, aka “Cano de Guaynabo”, [73] FNU LNU, aka “Pito”, [74] STEPAHNIE VENTURA VELAZQUEZ, aka “Stephanie”, [75] MYRNA LUZ DURAN, aka “Nana”, [76] HECTOR RODRIGUEZ MORALES, aka “Cano”, [77] FNU LNU, aka Chiringa, [78] YIRAICA TORRES ROMERO, aka “Nana La Negra”, were sellers in the drug trafficking conspiracy. The sellers would distribute the narcotics and controlled substances at the drug point. They would gather the drug proceeds and deliver them to the runners. Some of them did

carry firearms to protect the day to day drug trafficking activities at the drug point.

G. Facilitators and Providers of Storage facilities

Co-conspirators, [79] JUAN MORALES ENCARNACION, aka "Juango", [80] GEORGE W. RIVERA RIVERA, aka "Wesley", [81] VICTOR FLORES MACHICOTE, aka "Vitilo", [82] BARBARA MARTINEZ AYUSO, aka "Barbie", served as facilitators for the drug trafficking organization. During the course of the conspiracy, the facilitators would assist in the drug trafficking business working as brokers, messengers, and providers of residences where the controlled substances, paraphernalia, drug proceeds and /or firearms and ammunition were stored and/ or where drug trafficking activities took place in furtherance of the conspiracy.

COUNT TWO of this Indictment is re-alleged and incorporated herein by reference, as an overt act in furtherance of the charged conspiracy. All in violation of Title 21, United States Code, Sections 841(a)(1), 846, and 860.

COUNT TWO

(Conspiracy to Use, Carry, Possess, and Discharge Firearms)

From in or about March, 2007, and continuing up to the date of the return of the captioned Indictment, in the District of Puerto Rico, elsewhere, and within the jurisdiction of the court,

[1] MALVIN NATER AYALA, aka "Malvin"

[2] EMANUEL RODRIGUEZ ISAAC, aka "Manuelito",

[3] CHRISTIAN ROSARIO BONILLA, aka "Christian Nora" and "Mellao",

[4] MELVIN BENITEZ AYALA, aka "Wichi"

[5] JONATHAN MORALES-AYALA, aka "Yani Bembul",

- [6] CARLOS MORALES AYALA, aka "Charlie"
- [7] LUIS ORTIZ GONZALEZ, aka "Luis Ortiz",
- [8] JESUS MALDONADO CALDERON, aka "Jesus Lata"
- [9] HECTOR MARQUEZ VELAZQUEZ, aka "Luis Peluca"
- [10] JORGE B. ANDRADES-CARABALLO, aka "Benny Chichi",
- [11] CARLOS E. VAZQUEZ MARTINEZ, aka "Carlote",
- [12] WILMER NIEVES CORREA, aka "Pichi",
- [13] EDGARDO J. GARCIA ORTIZ, aka "Gordo Sire" and "Edgardo",
- [14] ANGEL D. SANTIAGO RODRIGUEZ, aka "Gidel",
- [15] FNU LNU, aka "Chino 25", aka "Chino Valencia",
- [16] HOMMY LOPEZ ESPIER, aka "Hommy",
- [17] JAVIER LNU aka "Gato"
- [18] JOSE A. ORTIZ ACOSTA, aka "Anthony Clemente",
- [19] FNU LNU, aka "Luigi de Piñones",
- [20] ISMAEL CRUZ RAMOS, aka "Chapu",
- [21] RAFAEL CLAUDIO ZAYAS, aka "Claudio",
- [22] EDWIN DELGADO CABRERA, aka "Edwin",
- [24] ROBERTO LOPEZ OCASIO, aka "Titoi",
- [25] CHRISTOPHER CRUZ MORALES, aka "Tuti",
- [26] RAMON A. ROSA HANCE aka "Neon", aka "Neo",
- [27] JONATHAN CARMONA ROSARIO, aka "Jonathan",
- [28] NESTOR ALOMAR REYES, aka "Anibal",

- [33] VICTOR AYALA PRIETO, aka "Vitito",
- [34] CARLOS A. TORRES CARMONA, aka "Chocho",
- [35] CARLOS CARMONA AYUSO, aka "Whirlpool",
- [37] EDUARDO REYES NUÑEZ, aka "Aja",
- [39] FNU LNU, aka "Jorge",
- [40] LUIS FIGUEROA DELGADO, aka "Buho",
- [42] JAYCBALL MONTALVO ROSA, aka "Jaycball",
- [43] LUIS PAGAN CANDELARIA, aka "Oso",
- [44] ALFREDO NOBLE MEDINA, aka "Speedy"
- [45] ANGEL OSORIO PAGAN, aka "Angel Belen",
- [47] LUIS FRIAS DANZOT, aka "Pinguí",
- [49] CARMELO VAZQUEZ MARTINEZ, aka "Lito",
- [50] JOSE MARTINEZ ROBLES, aka "Bimbo"
- [51] FNU LNU, aka "Nefe",
- [52] FABIAN REYES ROCHE, aka "Fabian",
- [56] GADIEL ESCALERA ROMERO, aka "Gadiel",
- [63] JOSUE C. ANDINO FLORES, aka "Marito", aka "Milety"
- [66] PEDRO MARTINEZ ALVAREZ, aka "Pedro Bemba",
- [67] VICTOR A. RIVERA ORTIZ, aka "Papito Bocón" and "Papito China",
- [68] ALEJANDRO J. GUEDE PORTILLA, aka "Cuba" and "Alex",
- [70] ERIC J. GONZALES ALVAREZ, aka "Arroz",
- [71] MIGUEL FRIAS DANZOT, aka "Macho"

[72] JUAN SANCHEZ ARAOBA, aka "Cano de Guaynabo",

[73] FNU LNU, aka "Pito",

the defendants herein, along with other unindicted co-conspirators to the Grand Jury known and unknown, did knowingly conspire, combine, confederate, and agree together and with each other and with other persons, to commit an offense against the United States, that is, to knowingly possess, use, carry, brandish, and discharge firearms as that term is defined in Section 921(a)(3), of Title 18, United States Code, in furtherance of, or during and in relation to a drug trafficking crime, as that term is defined in Section 924(c)(2), of the Title 18, United States Code, to wit: conspiracy to possess with the intent to distribute and distribute narcotics and controlled substances, an offense which can be prosecuted in a court of the United States as a violation to Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), (b)(1)(C) & 841 (b)(1)(D), 846 and 860. All in violation of Title 18, United States Code, Sections 924(c)(1)(A)(i), (c)(1)(A)(ii), (c)(1)(A)(iii), and 924(o).

NARCOTICS FORFEITURE ALLEGATION

Upon conviction of one or more of the offenses alleged in Count One (1) of this Indictment, pursuant to Title 21, United States Code, Section 853 and Title 18, United States Code, Section 982(a)(1), each defendant who is convicted of one or more of the offenses set forth in said counts, shall forfeit to the United States the following property:

a. All right, title, and interest in any and all property involved in each offense in violation of Title 21, United States Code, Section 846, for which the defendants are convicted, and all property traceable to such property, including the following: 1) all commissions, fees and other property constituting proceeds obtained as a result of those violations; and 2) all property used in any manner or part to commit or to facilitate the commission of those violations.

b. A sum of money equal to the total amount of money involved in each offense, or conspiracy to commit such offense, for which the defendant is convicted, to wit: eight million dollars (\$ 8,000,000.00) in U.S. Currency. If more than one defendant is convicted of an offense, the defendants so convicted are jointly and severally liable for the amount involved in such offense.

c. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b), each defendant shall forfeit substitute property, up to the value of the amount described in paragraph one (1), if, by any act or omission of the defendant, the property described in paragraph one (1), or any portion thereof, cannot be located upon the exercise of due diligence; has been transferred, sold to or deposited with a third party; has been placed beyond the jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty.

All in accordance with Title 21, United States Code, Section 853 and Title 18, United States Code, 982(a)(1), and Rule 32.2(a) of the Federal Rules of Criminal Procedure.

FIREARMS AND AMMUNITION FORFEITURE ALLEGATION

The allegations contained in Counts One and Two of this Indictment/ are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).

Upon conviction of the offense[s] in violation of Title 18, United States Code, Section[s] 922(g)(1) set forth in Counts One and Two of this Indictment, the defendants, , shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any firearms and ammunition involved or used in the commission

of the offenses.

If any of the property described above, as a result of any act or omission of the defendant[s]:

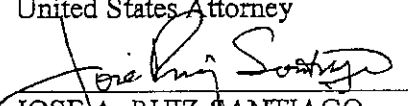
- a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with, a third party;
 - c. has been placed beyond the jurisdiction of the court;
 - d. has been substantially diminished in value; or
 - e. has been commingled with other property which cannot be divided without difficulty,
- the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c). All pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c).

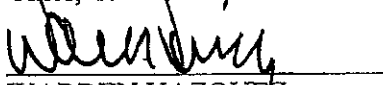
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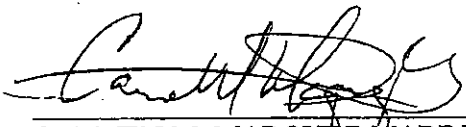
FOREPERSON


Dated: October 6, 2011

ROSA EMILIA RODRIGUEZ-VELEZ
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